

Exhibit B
(Email to USAO and USPO)

Michael A. Parente

From: Limehouse, Emily (USASC) <Emily.Limehouse@usdoj.gov>
Sent: Thursday, July 27, 2023 1:16 PM
To: Michael A. Parente; Daniel Schirra
Cc: Mark C. Moore; Stoughton, Kathleen (USASC); Holliday, Winston (USASC); Kelli Frye
Subject: RE: Government's Restitution and Forfeiture Memo [IWOV-NPDocuments.FID8184971]

Thanks so much for the clarification, Michael!

Emily Limehouse
Assistant United States Attorney
District of South Carolina
151 Meeting Street, Suite 200
Charleston, SC 29401
Office Phone: (843) 266-1663
Cell Phone: (843) 642-4591

From: Michael A. Parente <MParente@maynardnexsen.com>
Sent: Thursday, July 27, 2023 12:04 PM
To: Limehouse, Emily (USASC) <elimehouse@usa.doj.gov>; Daniel Schirra <Daniel_Schirra@scp.uscourts.gov>
Cc: Mark C. Moore <MMoore@maynardnexsen.com>; Stoughton, Kathleen (USASC) <KStoughton@usa.doj.gov>; Holliday, Winston (USASC) <WHolliday@usa.doj.gov>; Kelli Frye <Kelli_Frye@scp.uscourts.gov>
Subject: [EXTERNAL] RE: Government's Restitution and Forfeiture Memo [IWOV-NPDocuments.FID8184971]

Emily,

That is correct – our objection is based on Mr. Laffitte maintaining his innocence. We agree that if his conviction is affirmed, the fees are appropriately included as restitution and we do not question the legitimacy or reasonableness of the numbers provided by PSB or PMPED's counsel.

Thanks,

Michael A. Parente

Associate | Criminal Defense & Investigations | Litigation
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1230 Main Street
Suite 700
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From: Limehouse, Emily (USASC) <Emily.Limehouse@usdoj.gov>
Sent: Thursday, July 27, 2023 11:54 AM
To: Michael A. Parente <MParente@maynardnexsen.com>; Daniel Schirra <Daniel_Schirra@scp.uscourts.gov>

Cc: Mark C. Moore <MMoore@maynardnexsen.com>; Stoughton, Kathleen (USASC) <Kathleen.Stoughton@usdoj.gov>; Holliday, Winston (USASC) <Winston.Holliday@usdoj.gov>; Kelli Frye <Kelli_Frye@scp.uscourts.gov>
Subject: RE: Government's Restitution and Forfeiture Memo [IWOV-NPDocuments.FID8184971]

Hey Michael – Thank you for your email. Your summary of the Defendant's position on attorney's fees requested as restitution differs from my understanding. It is my understanding that the objection to the attorney's fees is based solely on the Defendant maintaining his innocence of the counts of conviction. However, you agree that if his conviction is affirmed, the fees are appropriately included as restitution. Therefore, the Defendant is not objecting to the legitimacy or reasonableness of the fees under the statute or relevant caselaw. Can you please clarify?

Thanks,

Emily

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From: Michael A. Parente <MParente@maynardnexsen.com>
Sent: Thursday, July 27, 2023 10:47 AM
To: Daniel Schirra <Daniel_Schirra@scp.uscourts.gov>
Cc: Mark C. Moore <MMoore@maynardnexsen.com>; Stoughton, Kathleen (USASC) <KStoughton@usa.doj.gov>; Holliday, Winston (USASC) <WHolliday@usa.doj.gov>; Kelli Frye <Kelli_Frye@scp.uscourts.gov>; Limehouse, Emily (USASC) <elimehouse@usa.doj.gov>
Subject: [EXTERNAL] RE: Government's Restitution and Forfeiture Memo [IWOV-NPDocuments.FID8184971]

Daniel,

I understand that you spoke to Mark yesterday regarding the objections we intend to withdraw on behalf of Mr. Laffitte. Please allow this email to serve as written confirmation of our positions.

First, we are withdrawing our objections to the enhancement for a vulnerable victim pursuant to U.S.S.G. § 3A1.1(b)(1).

Second, we agree that the conservatorship and personal representative fees totaling \$110,000.00 should be reimbursed by Mr. Laffitte. However, because Mr. Laffitte has repaid \$17,500.00, the remaining unpaid balance is \$92,500.00. While we maintain that these amounts should not be included in the loss amount calculation, we believe that, in equity, this amount should be repaid and Mr. Laffitte intends to do so with leave of the Court.

Finally, we withdraw our previously stated position that PMPED/Parker Law Group is not a victim of the offenses of conviction as PMPED/Parker Law Group was clearly a victim of the schemes concocted by and committed by Alex Murdaugh. We do not contest the reasonableness of the attorney's fees submitted by counsel for Palmetto State Bank and PMPED/Parker Law Group. While Mr. Laffitte continues to maintain his innocence and intends to appeal his conviction, if the Court concludes that the government has proven that these attorney's fees are properly attributable as restitution, we do not contest the reasonableness of the amounts.

As noted previously in discussions with the government, we believe that any restitution imposed in this case should be made joint and several with any restitution judgment ordered as against Alex Murdaugh. In addition, given the fact that Mr. Laffitte intends to appeal his conviction, we do not believe that Mr. Laffitte should be ordered to pay any restitution

or be required to liquidate any assets in order to do so until such time as his appeal is ultimately decided as his conviction will not be final unless and until it is affirmed.

Please let us know if you have any questions regarding these positions. Thank you,

Michael A. Parente

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From: Kelli Frye <Kelli_Frye@scp.uscourts.gov>
Sent: Tuesday, July 25, 2023 9:49 AM
To: Limehouse, Emily (USASC) <Emily.Limehouse@usdoj.gov>
Cc: Daniel Schirra <Daniel_Schirra@scp.uscourts.gov>; Michael A. Parente <MParente@maynardnexsen.com>; Mark C. Moore <MMoore@maynardnexsen.com>; Stoughton, Kathleen (USASC) <Kathleen.Stoughton@usdoj.gov>; winston.holliday_usdoj.gov <winston.holliday@usdoj.gov>
Subject: Re: Government's Restitution and Forfeiture Memo

Thank you, Emily.
Daniel, I will get these to chambers today.

Sent from my iPhone

On Jul 25, 2023, at 9:36 AM, Limehouse, Emily (USASC) <Emily.Limehouse@usdoj.gov> wrote:

CAUTION - EXTERNAL:

Kelli and Daniel –

Attached please find the Government's revised memorandum in support of our restitution and forfeiture request, including Exhibits. You will see from our memo that we are further reducing our forfeiture request, in an effort to be as reasonable as possible and give the Defendant all benefit of the doubt. I have also attached a revised preliminary order of forfeiture. Please share these materials with Judge Gergel.

Best,

Emily

Emily Limehouse
Assistant United States Attorney

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